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THE CITY OF NEW YORK

MICHAEL A. CARDOZO Corporation Counsel LAW DEPARTMENT

PEFANTIVELY

HURCH STREET

Assistant Corporation Counsel

YORK NY 10007

Tel.: (212) 788-9736

Tel.: (212) 788-9736
Fax: (212) 788-9776
Email. jbrooks@law.nyc.gov

EAD CASE 04 CIV 79ZZ (RJS) (JCF)

FILE ALSO IN 04 CIV 7921 (RIS) (TCF)
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IN O4 CIV 7921 (RIS) (TCF)

BY FACSIMILE

Honorable James C. Francis IV
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 1960
New York, New York 10007-1312

Re: RNC Consolidated Cases

USDS SDNY DOCUMENT

ELECTRONICALLY FILED

DOC #: _

DATE FILED: 6/3/

Dear Judge Francis:

I write in reference to motions filed by defendants on January 22, 2008 in thirty-eight of the RNC-related actions consolidated before Your Honor for discovery. These applications were omnibus motions to compel certain discovery from the plaintiffs in these actions. A list of the cases in which these motions were filed is annexed hereto as Appendix A.

At the last status conference, Your Honor stated that the parties could choose whether they wanted to file these motions with the Clerk of the Court. Defendants seek to file these motions with the Clerk, and therefore respectfully request that Your Honor enter an order permitting defendants to file their January 22, 2008 case-specific motions and any replies thereto under seal. As the Court is aware, sealing is required because in these case-specific applications defendants moved for, *inter alia*, orders compelling certain plaintiffs to produce releases for access to their mental health and medical treatment records and, in so moving, discussed various plaintiffs' histories.

Respectfully submitted,

Jeffrey C. Brooks

cc: RNC Distribution List (via email)

Application graved. Any texter ted to these applications may be where seal. SO ORDERGED. James C. Francis II

Abdell, Tarasik, et al. v. City of New York, et al., 05 CV 8453 (RJS) (JCF)

Adams, Courtney Lee, et al. v. City of New York, et al., 05 CV 9484 (RJS) (JCF)

Araneda, Barbara, et al. v. City of New York, et al., 05 CV 9738 (RJS) (JCF)

Banno, Yusuke v. City of New York, et al., 06 CV 2270 (RJS) (JCF)

Bastidas, Betty, et al. v. City of New York, et al., 05 CV 7670 (RJS) (JCF)

Biddle, Jeremy, et al. v. City of New York, et al., 05 CV 1570 (RJS) (JCF)

Botbol, Sacha, et al. v. City of New York, et al., 05 CV 1572 (RJS) (JCF)

Bunim, Sharone, et al. v. City of New York, et al., 05 CV 1562 (RJS) (JCF)

Coburn, Sarah, et al., v. City of New York, et al., 05 CV 7623 (RJS) (JCF)

Conley, Brian v. City of New York, et al., 05 CV 10024 (RJS) (JCF)

Crotty, Emilia, et al. v. City of New York, et al., 05 CV 7577 (RJS) (JCF)

Drescher, Udo v. City of New York, et al., 05 CV 7541 (RJS) (JCF)

Dudek, Carol v. City of New York, et al., 04 CV 10178 (RJS) (JCF)

Eastwood, Corey, et al. v. City of New York, et al., 05 CV 9483 (RJS) (JCF)

Galitzer, Gwynn v. City of New York, et al., 05 CV 7669 (RJS) (JCF)

Garbini, Adrienne, et al. v. City of New York, et al., 05 CV 1565 (RJS) (JCF)

Greenwald, Adam, et al. v. City of New York, et al., 05 CV 1566 (RJS) (JCF)

Kalra, Ritu, et al. v. City of New York, et al., 05 CV 1563 (RJS) (JCF)

Karlin, Annette v. City of New York, et al., 05 CV 7789 (RJS) (JCF)

Lahn-Sheen Lee, Jeanette v. City of New York, et al., 05 CV 5528 (RJS) (JCF)

Lalier, Kathleen, et al. v. City of New York, et al., 05 CV 7580 (RJS) (JCF)

Macnamara, Deirdre, et al. v. City of New York, et al., 04 CV 9216 (RJS) (JCF)

Martiui, John v. City of New York, et al., 05 CV 9881 (RJS) (JCF)

Meehan, Alison, et al. v. City of New York, et al., 05 CV 5268 (RJS) (JCF)

Case 1:05-cv-07672-RJS-JCF Document 83 Filed 06/03/2008 Page 3 of 3 Moran, Matthew, et al. v. City of New York, et al., 05 CV 1571 (RJS) (JCF)

Pagoda, John v. City of New York, et al., 05 CV 7546 (RJS) (JCF)

Phillips, Jeffrey, et al. v. City of New York, et al., 05 CV 7624 (RJS) (JCF)

Pickett, Brian, et al. v. City of New York, et al., 05 CV 1567 (RJS) (JCF)

Portera, Brian v. City of New York, et al., 05 CV 9985 (RJS) (JCF)

Rechtschaffer, Jessica v. City of New York, et al., 05 CV 9930 (RJS) (JCF)

Remmes, Chris v. Chapman, Mark, et al., 05 CV 9940 (RJS) (JCF)

Ryan, Lindsay, et al. v. City of New York, et al., 05 CV 1564 (RJS) (JCF)

Sloan, Emily, et al. v. City of New York, et al., 05 CV 7668 (RJS) (JCF)

Smith, Matthew v. City of New York, et al., 06 CV 1779 (RJS) (JCF)

Stark, Jeffrey, et al. v. City of New York, et al., 05 CV 7579 (RJS) (JCF)

Tikkun, Kaitlyn v. City of New York, et al., 05 CV 9901 (RJS) (JCF)

Tremavne, Wendy, et al. v. City of New York, et al., 05 CV 1568 (RJS)(JCF)

Xu, Randy, et al. v. City of New York, et al., 05 CV 7672 (RJS) (JCF)